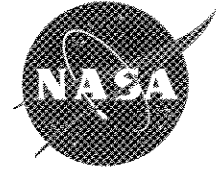


National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001

June 24, 2011



Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA employees at the SpaceX Award Reception and Luncheon on June 29, 2011

On June 29, 2011, the Robert A. and Virginia Heinlein Prize Trust, a non-profit organization organized under Section 501(c)(3) of the Internal Revenue Code, will host an awards reception and luncheon at the Hyatt Regency Washington, Capitol Hill, in Washington, D.C., at 12 PM. The Heinlein Prize award will be presented to Elon Musk, founder and Chief Executive Officer of Space Exploration Technologies (SpaceX).

Approximately 100 people were invited to attend, including representatives of NASA, DOD, the aerospace industry, the U.S. Congress, and academia. The estimated cost of the reception and luncheon, including all food and beverages, is \$45.00 per person. I find that the event meets the requirements of a "widely-attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Attendance at the event will allow NASA attendees to exchange information regarding various NASA programs.

Accordingly, NASA employees who have been invited to attend may accept free attendance at the event. However, NASA employees whose duties may substantially affect the Heinlein Prize Trust, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor. Moreover, invited NASA employees who are in non-career positions who are required to sign the ethics pledge under Executive Order 13490 may attend as well.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone". The signature is fluid and cursive, with a large, stylized "A" and "G".

Adam F. Greenstone